

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>ZACHARY J., through his parents, JONATHAN and JENNIFER J.,</b>	:	<b>Civil Action</b>
	:	
	:	<b>No. 19-0652</b>
Plaintiffs,	:	
	:	
v.	:	
	:	
<b>COLONIAL SCHOOL DISTRICT,</b>	:	
	:	
Defendant.	:	<b>Hon. John Milton Younge</b>

**DEFENDANT, COLONIAL SCHOOL DISTRICT’S REPLY TO  
PLAINTIFF’S LETTER BRIEF (ECF 21)**

Plaintiff submitted a letter to the Court pointing out the case of *M.D. v. Colonial Sch. Dist.*, Civ. A. 20-2354, 2021 WL 1924083 (E.D. Pa. May 13, 2021). Per permission inferred from Chamber’s Procedures, Civil A.5. (permitting replies), Defendant briefly states that the undersigned is quite familiar with the *M.D.* case, being counsel for the school district. There really is no meaningful similarity with this case. And, the *M.D.* case is not final and the decision likely to be appealed. In any event, a more meaningfully similar case is the Hon. John Milton Younge’s decision in *Gwendolynne, S. through Judy S. v. West Chester Area Sch. Dist.*, Civ. A. 19-3844-JMY, 2021 WL 949483 (E.D. Pa. Mar. 12, 2021). But ultimately every case is unique, turning on the student’s unique needs and the quality of the administrative record.

SWEET, STEVENS, KATZ & WILLIAMS LLP

Date: September 30, 2021

By: /s/ Karl A. Romberger, Jr.  
Karl A. Romberger, Jr., Esquire, Atty ID #60636  
331 Butler Avenue, P. O. Box 5069  
New Britain, Pennsylvania 18901  
(215) 345-9111 – Office  
(215) 348-1147 – Facsimile

*Attorneys for Defendant,  
Colonial School District*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>ZACHARY J., through his parents, JONATHAN and JENNIFER J.,</b>	:	<b>Civil Action</b>
	:	
	:	<b>No. 19-0652</b>
Plaintiffs,	:	
	:	
v.	:	
	:	
<b>COLONIAL SCHOOL DISTRICT,</b>	:	
	:	
Defendant.	:	<b>Hon. John Milton Younge</b>

**CERTIFICATE OF SERVICE**

I, Karl A. Romberger, Jr., Esquire, counsel for Defendant, hereby certify that a true and correct copy of the DEFENDANT, COLONIAL SCHOOL DISTRICT'S REPLY TO PLAINTIFF'S LETTER BRIEF (ECF 21), is available and was served through the Court's ECF filing system upon counsel of record.

SWEET, STEVENS, KATZ & WILLIAMS LLP

Date: September 30, 2021

By: /s/ Karl A. Romberger, Jr.  
Karl A. Romberger, Jr., Esquire, Atty ID #60636  
331 Butler Avenue, P. O. Box 5069  
New Britain, Pennsylvania 18901  
(215) 345-9111 – Office  
(215) 348-1147 – Facsimile

*Attorneys for Defendant,  
Colonial School District*